

# Exhibit 4

**Colombo, Jessica**

---

**From:** Emily Marlowe <EMarlowe@carlsonattorneys.com>  
**Sent:** Wednesday, June 19, 2024 7:53 PM  
**To:** GHalperin@cov.com; 'Simonsen, Ashley M'; andrea.pierson@faegredrinker.com; Connolly, Daniel J.; gdrake@kslaw.com; amy.fiterman@faegredrinker.com; Bell, Lauren; Teshuva, Ariel; rose.ehler@mto.com; jonathan.blavin@mto.com; Ercole, Brian M.; cchiou@wsgr.com; ahardin@wc.com  
**Cc:** Hazam, Lexi J.; Warren, Previn; Andrews, Patrick I.; Ruth Rizkalla; Social Media Claims  
**Subject:** [EXT] SM Rodriguez, Maria Elena obo MG In Re: Social Media Addiction  
**Attachments:** Maria Elena Rodriguez - ESI Disclosures .xlsx

Counsel,

Please see the attached data source disclosure for Plaintiff Maria Elena Rodriguez, individually and as parent and next of friend to minor Plaintiff M.G., which Plaintiff provides in response to Defendants' request for information on Plaintiff's data sources. These disclosures include data sources that Plaintiff has identified as potentially containing relevant information based on investigations to date. In addition, to the extent additional data sources are identified, collected, and searched beyond those identified in the attached disclosures, and responsive information is found in such sources, Plaintiff agrees to provide Defendants with a list of such sources.

As we have previously discussed, Plaintiff does not currently have access into the content of M.G.'s devices, or the ability to access any of M.G.'s accounts as M.G. is deceased. Accordingly, the attached sources are provided based upon current information and belief.

Please let us know if you have any questions. Thank you.

Sincerely,

Emily Marlowe



**Emily Marlowe**  
**Attorney**

O: 800-359-5690 F: 254-526-2325

[CarlsonAttorneys.com](http://CarlsonAttorneys.com)

1500 Rosecrans Avenue, Suite 500 • Manhattan Beach • CA • 90266

E-MAIL CONFIDENTIALITY STATEMENT: This transmission may be subject to the attorney-client privilege; may be attorney work product; or may be strictly confidential. If you are not the intended recipient of this message, you may not disclose, print, copy or disseminate this information. If you have received this in error, please reply and notify only the sender and delete the message. Unauthorized interception of this e-mail is a violation of Federal criminal law.

Plaintiff	Data Source	Description
Maria Elena Rodriguez	iPhone 11	MG's mobile device
Maria Elena Rodriguez	iPad 10th Gen.	MG's tabley
Maria Elena Rodriguez	iPhone 11	Mobile device
Maria Elena Rodriguez	MG's Instagram Accounts	Social Media - do not know passwords to any accounts
Maria Elena Rodriguez	MG's TikTok Accounts	Social Media - do not know passwords to any accounts
Maria Elena Rodriguez	YouTube	Social Media
Maria Elena Rodriguez	MG's Snapchat Accounts	Social Media - do not know passwords to any accounts
Maria Elena Rodriguez	MG's Outlook Email Account	MG's email - do not know password
Maria Elena Rodriguez	MG's Facebook Accounts	Social Media - do not know passwords to any accounts
Maria Elena Rodriguez	MG's Gmail Account(s)	Email Accounts
Maria Elena Rodriguez	MG's iCloud Account(s)	Possible email of MG associated with Snap - do not have password
Maria Elena Rodriguez	Facebook Account	Plaintiff's Social Media
Maria Elena Rodriguez	Laptop	Personal Laptop
Maria Elena Rodriguez	iCloud Account	Personal Email